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Attorneys for Plaintiff
VIGEN TOVMASYAN AND THE
PROPOSED CLASS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

VIGEN TOVMASYAN,
individually and on behalf of all
others similarly situated,

Plaintiff,

v.

TARGET CORPORATION, a
corporation, and DOES 1-20,
inclusive,

Defendants.

Case No.: 2:25-cv-02314-MRA-KS

Assigned to District Judge:
Hon. Monica Ramirez Almadani

**JOINT STIPULATION REQUESTING
THE FIRST CONTINUANCE OF THE
SCHEDULING CONFERENCE**

DATE: June 30, 2025
TIME: 1:30 p.m.
COURTROOM: 10B

TO THE HONORABLE COURT:

Plaintiff Vigen Tovmasyan (“Plaintiff”) and Defendant Target Corporation (“Defendant”) (collectively, the “Parties”) agree to the terms set forth herein for purposes of Requesting the First Continuance of the Scheduling Conference in the above-captioned action (“Agreement”).

WHEREAS, Defendant removed this matter to federal court on March 14, 2025 (ECF No. 1) and on March 17, 2025 it was assigned to Judge Almadani (ECF No. 5).

WHEREAS, on May 6, 2025, the Court issued an order (ECF No. 24) setting the Scheduling Conference pursuant to Rule 16(b) of the Federal Rules of Civil Procedure (the “Rules”) for June 30, 2025, and ordering the parties to file a Joint Rule 26(f) Report by June 16, 2025.

WHEREAS, due to a pre-existing scheduling conflict, Lead Trial Counsel for Defendant is unavailable for the Scheduling Conference presently set for June 30, 2025.

WHEREAS, to permit Defendant’s Lead Trial Counsel to attend the Scheduling Conference, the Parties have conferred and agree that, in light of the conflict, the Parties request their first continuance of the Scheduling Conference.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their respective counsel of record herein, that:

1. In the interest of judicial economy, the Parties request their first continuance of the Scheduling Conference on calendar for June 30, 2025 to July 7, 2025, or any subsequent date at the Court’s convenience.

2. The Parties will meet and confer no later than June 9, 2025 as required by Rule 26(f).

3. The Parties will file their Joint Rule 26(f) Report no later than June 16, 2025.

IT IS SO STIPULATED.

Date: May 28, 2025

HAYNES AND BOONE, LLP

By: /s/ Brent Owen

Brent Owen

Letitia Johnson Smith

Attorneys for Defendant

TARGET CORPORATION

Date: May 28, 2025

MALK & POGO LAW GROUP, LLP

By: /s/ Valter Malkhasyan

Valter Malkhasyan

Erik Pogosyan

Attorneys for Plaintiff

VIGEN TOVMASYAN AND THE

PROPOSED CLASS

CM/ECF ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing thereof.

DATED: May 28, 2025

By: /s/ Letitia Johnson-Smith

Letitia Johnson Smith